

MARK C. SEVERINO, ESQ.
Nevada Bar No. 14117
ELISA L. WYATT, ESQ.
Nevada Bar No. 13034
**WILSON, ELSE, MOSKOWITZ, EDELMAN
& DICKER LLP**
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
(702) 727-1400; FAX (702) 727-1401
mark.severino@wilsonelser.com
elisa.wyatt@wilsonelser.com
Attorneys for Defendant
SOUTHWEST AIRLINES CO.

**UNITES STATES DISTRICT COURT
DISTRICT OF NEVADA**

VALERIE MCCABE,

Plaintiff,

v.

SOUTHWEST AIRLINES, CO., a Foreign
Corporation; DOES 1 through 50; and ROE
ENTITIES 2 through 100 inclusive,

Defendants.

CASE NO: 2:22-cv-01628-JAD-VCF

**STIPULATION TO ENLARGE THE
TIME FOR SOUTHWEST TO RESPOND
TO PLAINTIFF'S MOTION TO
REMAND**

[ECF No. 9]

The parties, Defendant, SOUTHWEST AIRLINES, CO., by and through its counsel of record, Wilson, Elser, Moskowitz, Edelman and Dicker, LLP, by Mark C. Severino, Esq. and Plaintiff, VALERIE MCCABE, by and through her counsel of record, Donn W. Prokopius, Esq. of Donn W. Prokopius, Chtd., hereby submit the following STIPULATION TO ENLARGE SOUTHWEST AIRLINE'S TIME TO RESPOND TO PLAINTIFF'S MOTION TO REMAND:

1. Plaintiff filed her Motion to Remand on October 10, 2022.
2. Since that time, the parties, through their undersigned counsel, have been negotiating a stipulation regarding the Motion to Remand.
3. At this time, an agreement has not been reached, but the parties continue to negotiate.

4. As a result, the parties have agreed and stipulated to enlarge Southwest's time to file an opposition brief or otherwise respond to Plaintiff's Motion to Remand.

5. Pursuant to the agreement, Southwest's new deadline to oppose or otherwise respond to the Motion to Remand shall be Friday, November 4, 2022.

**WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER LLP**

By: /s/ Mark C. Severino
MARK C. SEVERINO, ESQ.
Nevada Bar No. 14117
ELISA L. WYATT, ESQ.
Nevada Bar No. 13034
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
(702) 727-1400; FAX (702) 727-1401
mark.severino@wilsonelser.com
elisa.wyatt@wilsonelser.com
Attorneys for Defendant
SOUTHWEST AIRLINES CO.

DONN W. PROKOPIUS, CHTD.

By: /s/ Donn W. Prokopius
DONN W. PROKOPIUS
Nevada Bar No. 6460
3407 West Charleston Blvd.
Las Vegas, Nevada 89102
(702) 474-0500; FAX (702)-951-8022
donn@dwp-law.com
Attorneys for Plaintiff
VALERIE MCCABE

IT IS SO ORDERED.

Dated this 24th day of October, 2022.


UNITED STATES DISTRICT JUDGE

Respectfully Submitted:

**WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER LLP**

By: /s/ Mark C. Severino, Esq.
Mark C. Severino, Esq.
Nevada Bar No. 14117
Elisa L. Wyatt, Esq.
Nevada bar No. 13034
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, Nevada 89119
Telephone: 702.727.1400
Facsimile: 702.727.1401
Attorneys for Defendant
SOUTHWEST AIRLINES CO.